

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

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Conservation Law Foundation, Inc.,

Plaintiff,

v.

Nylon Corporation of America, Inc., *et al.*

Defendants.

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Civil Action No. 1:22-cv-00111-LM

**JOINT MOTION REQUESTING COURT-ADMINISTERED MEDIATION**

Pursuant to Rule 53.1(c) of the Local Civil Rules for the United States District Court for the District of New Hampshire, Plaintiff Conservation Law Foundation, Inc. (“CLF”), and Defendants Nylon Corporation of America, Inc. (“Nylon”) and Wembly Enterprises, LLC (“Wembly”), respectfully submit this joint request for court-administered mediation. In support of this motion, the parties state as follows:

1. On April 4, 2022, CLF filed its complaint. ECF No. 1 (Complaint).
2. On September 23, 2022, Defendants filed their responses to the complaint. ECF No. 11 (Wembly’s Motion to Dismiss) and ECF No. 12 (Nylon’s Answer).
3. On October 31, 2022, the parties filed a Rule 26(f) proposed Discovery Plan. ECF No. 24 (Discovery Plan). The Discovery Plan indicated that the parties had met several times to discuss the case and that they believed court-administered mediation would enhance settlement discussions. The parties requested mediation with a Magistrate or District Judge prior to pursuing discovery.

4. On November 9, 2022, the Court held a pretrial conference with Magistrate Judge Andrea K. Johnstone. Judge Johnstone stated that she is willing to serve as mediator for this matter and directed the parties to file a motion with this Court requesting mediation.

5. Pursuant to Local Rule 7.1(a)(2), the parties state that they have not attached a memorandum of law because the motion does not rely on legal argument and is a matter of the Court's discretion, and so no accompanying memorandum of law is necessary.

WHEREFORE, the parties respectfully request that the Court grant their request for court-administered mediation to be held before Magistrate Judge Andrea K. Johnstone.

Respectfully submitted,

CONSERVATION LAW FOUNDATION,  
INC.

Dated: November 14, 2022

By its attorneys,

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NYLON CORPORATION OF AMERICA  
INC., et al.

By their attorneys,

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**CERTIFICATE OF SERVICE**

I, Thomas F. Irwin, certify that the foregoing motion shall be served on all parties in this action that have filed appearances and requests for notices, via ECF.

Date: November 14, 2022

/s/ Thomas F. Irwin

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